

# South Carolina 2024 ARPA Grant Program

## Application SLFRF 3.0



### Section 1.1 - Applicant Information

Legal Entity/Organization Name	Comcast Cable Communications, LLC
Parent Organization	Comcast Corporation
Entity Type (e.g. Corporation, non-profit, cooperative, governmental entity)	Corporation
Primary Contact Name	Melinda Little
Title	Vice President, Government Affairs
Mailing Address City, State, Zip	2605 Circle 75 Parkway SE, Atlanta, GA 30339
Phone Number	(713) 498-4299
Email	Melinda_Little@comcast.com
Secondary Contact Name	Andres Celedon
Title	Senior Manager, Government and Regulatory Affairs
Mailing Address City, State, Zip	2605 Circle 75 Parkway SE, Atlanta, GA 30339
Phone Number	(865) 209-5581
Email	Andres_Celedon@comcast.com
FCC Registration Number (FRN):	3768165
Registered in the System for Award Management (SAM) - (Yes/No)	Yes
Unique Entity ID (UEI) Number	KNDSXJ6FBQT7
Federal Tax ID Number	23-2175755
SC State Vendor Number	7000304569

## Section 1.2 - Project Name/Number

Project Number (Format XXX-XX)	BEC-01
Project Name	COMCAST-2024-BSO-BERKELEYCHARLESTONCO
Project Priority (1-5, 1 serving as highest priority for applicant)	2

## Section 1.3 - Broadband Service Provider Context

Date of Applicant's Initial FCC Submission	Same as previously provided.
Date of Applicant's Most Recent FCC Submission	3/1/2024
Applicant has experience delivering broadband service via fiber and/or hybrid fiber-coax infrastructure (YES/NO)	Yes

## Section 1.4 - Broadband Infrastructure Information

Indicate the type(s) of broadband infrastructure technology to be deployed in the project service area. Projects must provide a minimum of 100/20 Mbps scalable to 100/100 Mbps. Applicant must explain in detail why the proposed project cannot provide 100/100 Mbps.	Fiber to the Premises Minimum Sustainable Download/Upload Speeds 100/100 Mbps
Will all structures be served with the same technology type?	Yes
Estimated Miles of Fiber to be Installed	43
Estimated Percentage Underground	40.00%
Estimated Percentage Aerial	60.00%

## Section 1.5 - Project Timeline

Project Start Date	June 30, 2024
Project Construction Activity Begins	January 21, 2025
Project Construction Activity Completion	June 21, 2026
<b>Customer Premises</b> <i>Initiation of Operations (premise installations begin)</i>	September 21, 2025
Overall Project Completion Date	June 30, 2026
Will the project be completed within 24 months of official Notice to Proceed (NTP)?	Yes

### **Section 1.6 - Low-Cost Plan**

**(Must be a minimum of 100/20 Mbps)**

What Download/Upload speed is offered in your low-cost residential plan? (Example 100/20)	100/20
What is the monthly cost of the plan?	\$29.95
Does the above speed tier include unlimited data? (YES/NO)	Yes
Is a Consumer-based Contract Required? (YES/NO)	No
Duration of Low-Cost Plan (Post Construction)	1-year

### **Section 1.7 - Free Public Wi-Fi**

Will a new Free Public Wi-Fi location(s) be added? Free Public Wi-Fi is a location where anyone can access the Wi-Fi network at no cost 24/7, 365 days. Wi-Fi location needs to be in county or counties applied for.	No
If yes, how many locations will be added?	0
If yes, specify the duration the applicant will offer this service.	No Free Wi-Fi

### **Section 1.8 - Network Resiliency**

**Indicate if any of the Network Resilient Items will be implemented in the project area.**

Ensure power redundancy with DC Battery/Diesel/Gas Generator Backup from temporary power loss at premise, Network Operations Center (NOC), and OLTs.	Will NOT Implement
Ensure OLTs have divergent paths to redundant upstream equipment.	Will NOT Implement
Configure OLTs on a fiber ring so the network may continue operation if fiber is cut and/or damaged.	Will NOT Implement
Establish an Emergency Action Plan (EAP).	Will Implement
Conduct readiness drills and tabletop exercises leveraging the EAP, document lessons learned and update the EAP based upon findings.	Will NOT Implement
Deploy facilities underground as opposed to aerial to minimize impacts of downed utility poles from hurricanes, tornadoes, and vehicle accidents occurring in rights of way.	Will NOT Implement
Diversify connectivity by including more than a single tier-one provider as an access point to the Internet through the ISP's network.	Will NOT Implement
Maintain field service teams and spare equipment on standby before, during, and after major weather events and enact mutual assistance agreements, if appropriate.	Will Implement
Conduct regular site inspections for encroachments, damaged facilities, susceptible facilities or other threats through field reconnaissance and windshield surveys on facilities.	Will Implement
Elevate OLTs above base flood elevations in mapped floodplains and associated flood-prone areas.	Will Implement

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**Section 2.2 - Funding Details**

Description	Comment	Amount
South Carolina ARPA Broadband Grant Program Funds requested		\$ 1,627,289.54
Applicant-Provided Funding		\$ 1,227,604.39
Third-Party Funding Source (if applicable)		\$ -
Total Project Cost		\$ 2,854,893.93
Percentage Funds Requested from SC Broadband Office		57%
Percentage Funds from Applicant Match		43%
Percentage Funds from Third Party Funding Source		0%

**ADJUST APPLICANT  
PROVIDED FUNDING  
AMOUNT TO GET WHOLE  
PERCENTAGES ONLY**

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## Section 3.1 Confirmations

Applicant participates in the Affordable Connective Program (ACP) and will participate in the ACP for the life of ACP for the Project Service Area.

Agree

Applicant will provide at least one low-cost option without data usage caps and at speeds sufficient for households with multiple users for a disclosed period of time.

Agree

The Project will comply with the requirements set forth in ARPA, South Carolina Act No. 244 of 2022, and other federal, state, and local laws, including environmental and permitting laws and regulations.

Agree

The Applicant will not use ARPA funds to procure or obtain certain telecom and video surveillance services or equipment as outlined in 2 CFR 200.216 and 2 CFR 200.471.

Agree

Applicant will not use ARPA funds to modernize cybersecurity for existing and new broadband networks.

Agree

Applicant will not procure telecommunications equipment or services from China.

Agree

The Project includes pre-project development uses or costs

Disagree

If Yes to above, the pre-development uses or costs will be (1) tied to an eligible broadband project or reasonably expected to lead to such a project; and (2) obligated within the period between Feb. 1, 2024, and December 31, 2026 and expended to cover such obligations by December 31, 2026.

Select one

Applicant will require its employees, contractors, and subcontractors to comply with the applicable requirements in the South Carolina Underground Facility Damage Prevention Act pursuant to Title 58, Chapter 36 of the South Carolina Code of Laws, as amended.

Agree

Applicant affirms that it will consult with the SC Department of Transportation, electric utilities as well as local water sewer utilities as to any possible efficiencies that can be achieved with a “dig once” approach.

Agree

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## **4.1 - Additional Information**

(max 2000 character limit per item)

Provide a Summary Narrative that describes your project.

**This narrative must be unique for each project and discuss this project only. Refrain from discussing rates, structure counts, estimated dates, work that occurred in the past, or the Company's history of providing Broadband service. Limit 750 Characters.**

This scope of services proposes to construct a Fiber-to-the-Premises ("FTTP") [using fiber-optic Ethernet Passive Optical Network ("EPON") technology] network in Berkeley Charleston County that will be capable of providing gigabit symmetrical broadband to homes, businesses, and anchor institutions across the Project Area. The Project Area contains unserved census blocks ("CB") and partially served CB that include priority areas with no current ISPs, Difficult Development Areas identified by HUD, and areas with high concentrations of public K-12 student households.

Describe how your proposal meets the needs of the community to be served as described in the "Guidelines."  
**Refrain from discussing rates, structure counts, estimated dates, work that occurred in the past, or the Company's history of providing Broadband service. Limit 500 Characters (including spaces).**

Upon completion, the proposed broadband network will improve the community's quality of life by enabling residents to expand career pathways (search and apply for jobs), increase economic development and engagement (telework/job retention and marketing), access and engage in telehealth opportunities (direct communication with providers outside of Project Area), bridge digital skills gaps, pursue education (increased access to courses/materials with improved pacing and cost reductions), and more.

If the proposed Project is in an area that is subject to an existing federal or state funding commitment for reliable speeds of 100/20 Mbps, explain why there is an identified need for additional broadband investment that is not met by existing federal or state funding commitments.

Not applicable to this application.

Describe any plans or programs you have developed and propose to implement to improve adoption in the community described in this proposal.

As part of the proposal, Comcast will drive broadband adoption through a variety of means across the Project Area including direct mail, engaging local media, and direct grassroots outreach in the community. Comcast will also drive adoption through the promotion of its affordable subscriber options, Internet Essentials (“IE”), IE Plus, and the federal government’s Affordable Connectivity Program (“ACP”) to eligible residents. Under Comcast’s IE offering – the most comprehensive and successful low-income broadband adoption program in the nation – qualifying households can obtain broadband service at speeds of up to 50Mbps/10Mbps for \$9.95/month (plus applicable taxes, fees, and surcharges), or speeds of up to 100Mbps/20Mbps for \$29.95/month (plus applicable taxes, fees, and surcharges), as well as free digital skill training in person and online. Eligible IE customers also have the option to purchase a low-cost Internet-ready computer. Under ACP, enrolled households may receive a credit of up to \$30/month (\$75/month in Tribal lands) toward any Xfinity Internet service tier, including IE and IE Plus, and/or Xfinity Mobile service. As part of the above referenced adoption efforts – Comcast will conduct surveys across the Project Area to understand and track adoption statistics to better inform live and future adoption tactics. Project Area residents interested in Comcast’s services will be able to sign up for service via phone, online, or in person at the nearest Xfinity store. Comcast employs sales, marketing, and call center professionals – skilled in addressing product and service questions – to support these efforts. If conditions allow, a public meeting or event can be held with the local leaders and other key stakeholders to inform residents about the upcoming work and answer questions. Comcast will also host sign-up events, conduct surveys, and partner with local community organizations and non-profit groups to further broadband adoption in the Project Area.

Describe your plans or programs you have developed and propose to implement to increase digital literacy, for example, support through online training, for this project?

Comcast promotes the development of digital skills in communities by investing in hyper-local organizations and special projects that build digital literacy skills for today’s workforce economy. This work includes increasing basic digital and tech skills; advancing skills in online banking, telehealth, online safety, career development and STEAM; accelerating broadband adoption; expanding workforce training/certifications for adults; strengthening and forging partnerships to meet local business and community needs, and by Digital Navigator programs. Through its IE program, Comcast has partnered with hundreds of libraries, schools, and non-profit partners to deliver digital literacy training through a combination of classroom-style instruction and a portfolio of online training materials, including best-in-class curricula to engage the senior population. Eligible IE customers have access to free digital skills training in person and online. Project Area residents will have access to Comcast’s online Learning Center (<https://www.xfinity.com/learn/internet-service/internet-essentials/learning/internet-basics>) that includes modules covering Internet basics, online safety and security, educational resources, employment resources, and skill development resources (among others). Further, Comcast will commit to hosting at least one digital skills training event in the Project Area and will work to identify in-person digital skills training opportunities and locations, including potential Lift Zones – as described in Attachment 1, with local community partners and the State after the construction and activation phases of the Project. Through Project UP, Comcast’s comprehensive initiative to advance digital equity and build a future of unlimited possibilities, Comcast is committing \$1 billion to help ensure everyone has the resources and opportunities they need to participate and excel in today’s digital world.

Will the Project deliver broadband in the approved Project Area that meets or exceeds symmetrical download and upload speeds of 100/100 Mbps?	Yes
If no to above, explain and provide support demonstrating why the Project will not deliver such speeds and provide an affidavit that 100/100 Mbps symmetrical download/upload speeds are not practicable.	
N/A	
Explain how the Applicant will consult with the community in the Project Area on the general affordability needs of the target markets.	
<p>In every community it serves, Comcast is on a mission to drive digital equity through connecting the unconnected, providing digital skills training, and equitably distributing connected devices that allow unserved and underserved residents to participate and thrive in today’s digital world. As part of this Project, Comcast will become active advocates in the Berkeley Charleston community to ensure it is continuing the advancement of this mission that drives it. As part of those efforts, Comcast will consult with the Berkeley Charleston community to make sure it is considering the general affordability needs of the Project Area and to keep local officials and residents updated on its low-income service offerings and adoption efforts. Comcast will also convene partners across multiple industries, community-based organizations, and government agencies in the Berkeley Charleston community. One example of the partnerships Comcast will pursue is its Internet Essentials Partnership Program (“IEPP”). The IEPP is a program designed to help accelerate internet adoption in the communities Comcast serves. The IEPP provides the opportunity for local organizations to fund and quickly connect large numbers of students and families to reliable broadband access at home. Through its IEPP, which relies on local partnerships, sponsored students and families have access to all the benefits of Comcast’s IE and the option to purchase a low-cost computer. Through the trifecta of its IE offerings, IEPP, and its Lift Zones Comcast will be able to address Berkeley Charleston’s connectivity needs in an affordable manner for local residents while also addressing other factors impacting broadband adoption, such as a lack of digital literacy skills, concerns about sharing personal information with providers in order to get service, equipment needs, and language barriers among others.</p>	



<p>Will the Project (1) prioritize investments in fiber-optic infrastructure wherever feasible and focus on projects that deliver a physical broadband connection by prioritizing projects that achieve last mile connections or ensure funded middle mile projects have commitments in place to support new and/or improved last mile service; (2) include affordability options and shall participate in ACP for the life of ACP; and (3) prioritize support for local networks owned, operated, or affiliated with local governments, nonprofits, and cooperatives.</p>	<p>No</p>
<p>If no to above, explain.</p>	
<p>The Project will prioritize investments in fiber-optic infrastructure with a focus on delivering a physical broadband connection while also including affordability options and a commitment to participate in the federal government’s ACP program for the life of the program. However, the Project will not prioritize support for local networks owned, operated, or affiliated with local governments, nonprofits, and cooperatives because Comcast provides service over infrastructure that it fully constructs, manages, maintains, and owns and operates. Through its experience in building out sustainable broadband infrastructure around the country, Comcast has found that full ownership of infrastructure allows for seamless network management and increased flexibility for network scaling to quickly meet evolving consumer needs. This model has allowed Comcast to serve municipal, educational, business, and residential customers in a way that meets or exceeds the connectivity goals of these groups. Full ownership of the infrastructure also promotes the proper distribution of resources, lessens consumer pass-through costs, and prevents potential discriminatory overbuilds that hinder competition and private sector investment. Further, Comcast believes full ownership of its network lessens the burdens that municipal-controlled fiber places on local communities. Such burdens include the diversion of funds from core services and considerable operational and maintenance costs – with such costs quickly surpassing initial construction costs. These costs are incurred because of ongoing maintenance and ever-increasing service demands, which necessitate regular upgrades. The recurring demands in support of broadband infrastructure are complex endeavors that require enormous funds and experience. Comcast is well positioned to meet these demands and has the experience, capability, and capital to construct, own, manage, maintain, and operate a sustainable broadband network in the Project Area.</p>	
<p>If awarded, will the Grant funds be used to overbuild another existing broadband provider or to reimburse expenses related to overbuilding another broadband provider?</p>	<p>No</p>
<p>If yes to above, explain.</p>	
<p>N/A</p>	

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## 5.1 - Project Sponsors

Entity Name	Berkeley County Supervisor's Office
Entity Type (e.g. Corporation, non-profit, cooperative, governmental entity)	Governmental Entity
Role within proposed project	Sponsor
Primary Contact Name	David Kornahrens
Title	Chief Information Officer
Mailing Address City, State, Zip	1003 N. Highway 52, Moncks Corner SC 29461
Phone Number	843-719-4234
Email	davidkornahrens@berkeleycountysc.gov

## 5.2 - Project Sponsors

Entity Name	Charleston Metro Chamber of Commerce
Entity Type (e.g. Corporation, non-profit, cooperative, governmental entity)	Membership Organization
Role within proposed project	Supporter
Primary Contact Name	Bryan Derreberry
Title	President & CEO
Mailing Address City, State, Zip	4922 O'Hear Avenue, Suite 101, North Charleston, SC 29405
Phone Number	843-577-2510
Email	bderreberry@charlestonchamber.org

### **5.3 - Project Sponsors**

Entity Name	Tri-County Cradle to Career Collaborative
Entity Type (.e.g. Corporation, non-profit, cooperative, governmental entity)	Non-profit
Role within proposed project	Supporter
Primary Contact Name	Kenya Dunn
Title	Chair
Mailing Address City, State, Zip	2180 McMillan Avenue #71544, North Charleston, SC 29415
Phone Number	843-732-8221
Email	N/A

### **5.4 - Project Sponsors**

Entity Name	South Carolina General Assembly
Entity Type (.e.g. Corporation, non-profit, cooperative, governmental entity)	Government
Role within proposed project	Supporter
Primary Contact Name	Marvin Pendarvis & Thomas Hartnett, Jr.
Title	State Representative, District 113 & State Representative, District 110
Mailing Address City, State, Zip	328-B Blatt Building/416-A Blatt Building, Columbia, SC 29201
Phone Number	803-212-6716/803-212-6950
Email	MarvinPendarvis@schouse.gov/TomHartnett@sc house.gov

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## 6.1 - Attachment Checklist

(Please attach the following items to application)

### **GIS Shapefiles**

*Proposed 2020 Census Blocks*

Yes

*Proposed Fiber/Cable Lines*

Yes

*Proposed Structures Served by Type*

Yes

*Proposed Network Junctions*

Yes

Signed affidavit certifying grant application is complete and accurate

Yes

Proof of funding related to proposed project or non-cash support, provide associated documentation e.g. yearly financial reports, bank statement, etc.

Yes

Letters of support and strategic partnerships

Yes

Copies of Applicant's Current Fee Structure for all Internet Speed Tiers

Yes

Certificates of Insurance

Yes

Any additional information evidencing community need for project

Yes